

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

KENNETH D. BELL, in his capacity as court-
appointed Receiver for Rex Venture Group, LLC
d/b/a ZeekRewards.com,

Plaintiff,

vs.

TODD DISNER, in his individual capacity and in
his capacity as trustee for Kestrel Spendthrift
Trust; TRUDY GILMOND; TRUDY
GILMOND, LLC; JERRY NAPIER; DARREN
MILLER; RHONDA GATES; DAVID
SORRELLS; INNOVATION MARKETING,
LLC; AARON ANDREWS; SHARA
ANDREWS; GLOBAL INTERNET FORMULA,
INC.; T. LEMONT SILVER; KAREN SILVER;
MICHAEL VAN LEEUWEN; DURANT
BROCKETT; DAVID KETTNER; MARY
KETTNER; P.A.W.S. CAPITAL ANAGEMENT
LLC; LORI JEAN WEBER; and a Defendant
Class of Net Winners in
ZEEKREWARDS.COM;

Defendants.

No. 3:14-cv-91

MOTION TO ENTER FINAL JUDGMENTS
AGAINST NET WINNER CLASS MEMBERS

AFFIDAVIT OF MICHAEL BUSEN

Michael Busen, being duly sworn, deposes and says:

1. I am over the age of 18 and am competent to sign this Affidavit. The facts
stated in this Affidavit are based on my personal knowledge and information that I have

learned in the course of my work on behalf of the Receiver for Rex Venture Group, LLC ("RVG").

2. I understand this Affidavit will be used in support of the Receiver's Motion seeking Final Judgments against Net Winner class members.

3. I am a Managing Director within the Forensic and Litigation Consulting practice of FTI Consulting, Inc. ("FTI"). I have been employed by FTI for nine years.

4. Payments made to and received by affiliates of the ZeekRewards program are identified in the internal records of RVG, including SQL databases ("Zeek databases") maintained by RVG. These records also include all information submitted to ZeekRewards by affiliates when they signed up on the Zeek website, as well as affiliates' daily "advertising" reports and requests for disbursements.

5. Through my work for the Receivership, I have become familiar with the Zeek internal records and the steps required to appropriately identify Zeek affiliates, the payments made to affiliates over the course of the ZeekRewards program and the daily actions taken by affiliates when actively participating in ZeekRewards.

6. I was asked by the Receiver to determine the list of domestic Net Winners, Zeek affiliates who received more money from Zeek than they paid to Zeek, who received at least \$1,000 more from Zeek than they paid to Zeek.

7. Net Winnings were calculated as the total cash paid-out by Zeek less outside cash used to purchase VIP bids, retail bids, and subscription payments. Funds that affiliates chose to reinvest in the Zeek program were excluded from the Net Winnings calculation.


8. In order to develop the list of Net Winner class members, I utilized a two-step process to aggregate Zeek usernames at an individual person level. I first used valid nine-digit

SSNs to link usernames to the same class member. Any usernames not linked on SSN that did not have valid SSNs were then aggregated based upon the "Payee" field in the Zeek database.

9. Total Net Winnings for a class member are the sum of the Net Winnings/Net Losses associated with each username linked to the class member. When multiple usernames are linked to a class member, the class member is identified by the Zeek database information associated with the username having the highest Net Winnings.

10. The Receiver also asked that I calculate prejudgment interest for each class member. Prejudgment interest has been calculated at the North Carolina statutory rate of 8% per annum from August 17, 2012, which is on or after the date of the last fraudulent transfer payment to each Net Winner class member, to November 29, 2016, the date of the Summary Judgment Order in this action. For each Net Winner listed in Exhibit 1, the listed amounts reflect the Net Winnings, prejudgment interest, and total judgment amount calculated as previously described in this Affidavit.

Executed this 16TH day of June 2017.


Michael Busen

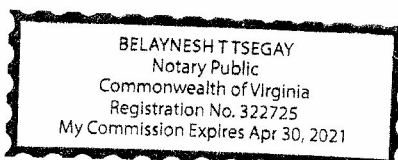
Virginia County, Arlington

Signed and sworn to before me this day by Michael R Busen
(Affiant's printed name)

Date: 6/16/17


(Notary signature)

BELAYNESH T TSEGAY, Notary Public
(Notary printed name)



My commission expires: April 30 2021